

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROADGET BUSINESS PTE. LTD., a private
limited company organized in the country of
Singapore,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE A HERETO

Defendants.

Case No. 1:24-cv-1088-CMH-WEF

DECLARATION OF CRAIG REILLY

I, Craig Reilly, declare as follows:

1. I am an attorney licensed in Virginia and in this Court. I am counsel of record for Defendant Shenzhen Chenhong Technology Co., Ltd. in this action. I am personally familiar with the facts stated below and, if called as a witness, could testify competently thereto.

2. I have reviewed Shein's website at <https://www.shein.com/>, which appears to be the "international" version of the Shein website. Shein's Terms & Conditions are presented in URLs at multiple locations on the landing page, including (1) at the bottom of the landing page and (2) on the side panel of the landing page by via a popup presenting a \$3 off coupon and free shipping offers to the website visitor.

3. Clicking on the "Terms & Conditions" URL at either location the landing page takes the website visitor to <https://www.shein.com/Terms-and-Conditions-a-399.html>, which provides the Shein Terms & Conditions with an Effective Date of March 15, 2022. A true and correct copy of the Terms & Conditions are attached hereto as **Exhibit A**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 11, 2024, in Alexandria, Virginia.

/s/ Craig C. Reilly